

# EXHIBIT A-2

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Jane Doe 1, individually and on behalf of all  
others similarly situated,  
Plaintiff,

v.

JPMorgan Chase Bank, N.A.,  
Defendant.

Case No. 1:22-CV-10019 (JSR)

**SUMMARY NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION**

**TO: ALL PERSONS WHO WERE HARMED, INJURED, EXPLOITED, OR ABUSED BY JEFFREY EPSTEIN, OR BY ANY PERSON WHO IS CONNECTED TO OR OTHERWISE ASSOCIATED WITH JEFFREY EPSTEIN OR ANY JEFFREY EPSTEIN SEX TRAFFICKING VENTURE, BETWEEN JANUARY 1, 1998, AND THROUGH AUGUST 10, 2019 (“CLASS”)**

**THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.**

YOU ARE HEREBY NOTIFIED that a hearing will be held on \_\_\_\_\_, **2023**, at \_\_\_\_:\_\_\_\_.m., before the Honorable Jed S. Rakoff at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY, 10007 to determine whether: (1) the proposed settlement (the “Settlement”) of the above captioned case (“Litigation”) as set forth in the Stipulation of Settlement dated June 22, 2023 (“Stipulation”)<sup>1</sup> for \$290,000,000 in cash should be approved by the Court as fair, reasonable, and adequate; (2) the Judgment as provided under the Stipulation should be entered dismissing the Litigation with prejudice; (3) to award Boies Schiller Flexner LLP and Edwards Henderson Lehrman attorneys’ fees, costs, and expenses out of the Settlement Fund and Class Representative an incentive award out of the Global Settlement Fund (as defined in the Notice of Proposed Settlement of Class Action (“Notice”), which is discussed below) and, if so, in what amount; and (4) the Plan of Allocation (as described in the Stipulation and Notice) should be approved by the

<sup>1</sup> The Stipulation can be viewed and/or obtained at [\[X\]](#).

Court as fair, reasonable, and adequate. The Court may adjourn or continue the Settlement Hearing, or hold it via telephone or video conference, without further notice to Class Members.

You are a “Class Member” if you are included within the following group::

All persons who were harmed, injured, exploited, or abused by Jeffrey Epstein, or by any person who is connected to or otherwise associated with Jeffrey Epstein or any Jeffrey Epstein sex trafficking venture, between January 1, 1998, and through August 10, 2019, inclusive.

This includes, but is not limited to, (1) individuals under the age of 18 who engaged in sexual contact with Epstein and/or a person connected to or otherwise associated with Epstein, and received money or something else of value in exchange for engaging in that sexual contact (even if the sexual contact was perceived to be consensual); (2) individuals aged 18 or older who were forced, coerced, or defrauded into engaging in sexual contact by Epstein and/or anyone connected to Epstein or otherwise associated with Epstein by, for example, using physical force, threatening serious harm or legal action, making a false promise, or causing them to believe that not engaging in sexual contact would result in serious harm, and who received money or something else of value in exchange for engaging in that sexual contact; (3) individuals of any age with whom Epstein, and/or a person connected to or otherwise associated with Epstein, engaged in sexual contact without consent (even if the sexual contact was perceived to be consensual provided that the individual was under the age of 18 at the time of engaging in that contact); and (4) individuals falling into examples (1)-(3) where the sexual contact occurred prior to January 1, 1998, who were harmed during the Class Period by the alleged obstruction of any government investigation or were otherwise harmed by Epstein’s conduct or were prevented within the Class Period from contacting law enforcement or otherwise seeking help by Epstein and/or anyone connected to Epstein or otherwise associated with Epstein by, for example, physical force, the threat of serious harm or legal action, or making a false promise.

To share in the distribution of the Settlement Fund, you must establish your rights by submitting a Questionnaire and Release by mail or electronically (**no later than \_\_\_\_\_, 2023**). Your failure to submit a Questionnaire and Release by \_\_\_\_\_, **2023** will result in a rejection of your claim and preclude you from receiving any recovery in connection with the Settlement of this Litigation. To opt-out of the Settlement and preserve your claims related to the Litigation, you must submit an Opt-Out Form by \_\_\_\_\_, **2023**. If you are a Class Member, you will be bound by the Settlement and any judgment and release entered in the Litigation, including, but not limited to, the Judgment, whether or not you submit a Questionnaire and Release unless you submit a timely Opt-Out Form.

If you would like a copy of the Notice, which more completely describes the Settlement and your rights thereunder (including your right to object to the Settlement), or the Settlement Forms described herein, you may obtain these documents, as well as a copy of the Stipulation (which, among other things, contains definitions for the defined terms used in this Summary Notice) and other Settlement documents, online at [\[X\]](#), or by writing to:

[To Be Determined]  
[\[X\]](#) (Claims Administrator Address)  
Email: [\[X\]](#) (Claims Administrator email)

Inquiries should NOT be directed to Defendant, Defendant's Counsel, the Court, or the Clerk of the Court.

Inquiries, other than requests for the Notice or for the Settlement Forms, may be made to Lead Counsel:

Brittany Henderson  
Bradley Edwards  
EDWARDS HENDERSON LEHRMAN  
1501 Broadway, Floor 12  
New York, New York 10036  
Email: [EpsteinJPMSettlement@epllc.com](mailto:EpsteinJPMSettlement@epllc.com)  
Toll-Free Telephone: [\[800-400-1098\]](tel:800-400-1098)

IF YOU DESIRE TO BE EXCLUDED FROM THE CLASS, YOU MUST SUBMIT A REQUEST FOR EXCLUSION (OPT-OUT FORM) SUCH THAT IT IS **RECEIVED BY \_\_\_\_\_, 2023**, IN THE MANNER AND FORM EXPLAINED IN THE NOTICE. ALL MEMBERS OF THE CLASS WHO HAVE NOT REQUESTED EXCLUSION FROM THE

CLASS WILL BE BOUND BY THE SETTLEMENT EVEN IF THEY DO NOT SUBMIT SETTLEMENT FORMS.

IF YOU ARE A CLASS MEMBER, YOU HAVE THE RIGHT TO OBJECT TO THE SETTLEMENT, THE PLAN OF ALLOCATION, THE REQUEST BY CLASS COUNSEL NOT TO EXCEED THIRTY PERCENT (30%) OF THE SETTLEMENT AMOUNT AND COSTS AND EXPENSES NOT TO EXCEED \$1,500,000.00, PLUS INTEREST EARNED ON BOTH AMOUNTS AT THE SAME RATE AS EARNED BY THE GLOBAL SETTLEMENT FUND. ANY OBJECTIONS MUST BE FILED WITH THE COURT AND RECEIVED BY CLASS COUNSEL AND DEFENDANT'S COUNSEL **BY** \_\_\_\_\_, **2023** IN THE MANNER AND FORM EXPLAINED IN THE NOTICE.

DATED: \_\_\_\_\_

BY ORDER OF THE  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK